

# **PRIVACY POLICY**

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In this Privacy Policy, 'us' 'we' or 'our' means True Pride Pty Ltd ACN 610 273 357 and our related bodies corporate. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by the Australian Privacy Principles contained in the Privacy Act.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

## **WHAT PERSONAL INFORMATION DO WE COLLECT?**

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you, we may collect the following types of personal information:

- Name, mailing or street address, email address, telephone number and other contact details;
- age or date of birth;
- credit card information;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

We may also collect the above types of information for purposes incidental to our business offerings and services.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone, or with written material. We may need to collect personal information from third parties, such as your accountant. We may collect this information when you:

- register on our website or app;
- communicate with us through correspondence, phone calls, chats, email, or when you share information with us from other social applications, services or websites; or
- interact with our advisors, employees, sites, services, content and advertising.

In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

## **WHY DO WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION?**

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our websites and services;
- to provide you with financial advice; 24 June 2019 3 of 6
- to operate, protect, improve and optimise our website, services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a purpose that is related to the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We and/or our carefully selected business partners may send you direct marketing communications and information about our products and services. This may take the form

of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

## **TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

Your personal information may be disclosed for purposes related to the provision to you of the financial advice you have requested. The types of service providers that may be provided with your personal information are: •

- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to disclosure for the purposes of providing financial advice, we may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (eg merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- a trusted third party who also holds other information about you;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

## **DISCLOSURE OF PERSONAL INFORMATION OUTSIDE OF AUSTRALIA**

In order to help research which products and services fit your needs, your information may be shared overseas with team members in the Philippines. This information will not be stored or used for any other purpose.

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## **USING WEBSITE AND COOKIES**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## **SECURITY**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, we have facilities for the secure storage of personal information, and secure offices and access controls for our computer systems. We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles. However, we cannot guarantee the security of your personal information.

## **ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION**

You can gain access to your personal information that we hold, by contacting us. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access please contact us (see "Contacting Us and Privacy Issues" below).

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and provide us with evidence that it is not accurate, complete and up-to-date. If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal

information we will provide you with the reasons for not correcting your personal information.

## **CONTACTING US AND PRIVACY ISSUES**

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us on 03 9111 2635. When making a complaint, we ask that you provide your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. We are committed to resolving your complaint, however if you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.